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February 25, 2025

VIA ECF

Hon. Arun Subramanian
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Quilodran v. 764 Third Avenue Wine & Liquor Inc. et al*
SDNY Case No.: 24-cv-09551-AS

Dear Judge Subramanian:

This firm, along with The Law Offices of Jaccob Aronauer, represents the Plaintiff in the above-referenced matter. We respectfully submit this letter to request an extension of time to submit our motion for a default judgment, currently due on February 28, 2025 (*ECF No. 22*), until March 28, 2025. The reason for this request is because the corporate defendant, 764 Third Avenue Wine & Liquor Inc., is the only defendant currently in default. The individual defendant, Cesar Quilodran, was served on February 11, 2025, and his response to the Complaint is currently due on March 4, 2025. *See ECF No. 24.*

Accordingly, in the interests of saving time and judicial resources, we would like to submit a single motion for a default judgment against all defendants if the individual defendant fails to timely appear by the deadline to respond. As well, we would like to note that the parties are currently in settlement discussions to see if we can resolve the matter. If we are unable to settle by March 28, 2025, we intend to move for the default motion against all defendants.

This is the first request for an extension of time regarding the above and there are no other deadlines in this matter. We attempted to contact Defendants' purported incoming counsel about their consent to file this letter but they have not responded to our correspondence. Should the Court need any additional information regarding this request, we will confer and readily provide same. Thank you for your time and courtesies.

Respectfully submitted,
Law Offices of Yale Pollack, P.C.

/s/ Yale Pollack
Yale Pollack, Esq.

The motion is now due on **March 14, 2025**. The Clerk of Court is respectfully directed to terminate the motion at ECF No. 25.

SO ORDERED.

Arun Subramanian, U.S.D.J.
Date: February 27, 2025